UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

SACHUSETTS

SACHUS

DEXTER BROWN

MOTION FOR LEAVE TO EXTEND CURFEW

Now comes the defendant in the above matter and moves that on July 4, 2004, his curfew be extended to midnight. As reason therefor the defendant says that he is desirous of taking his children to a block party in Lynn at which there will be a fireworks display.

The Assistant United States Attorney has represented to counsel that she has no objection, provided there are no objections from Pretrial Services. Thus far, counsel has been unable to reach Thomas O'Brien; the Pretrial Services Officer assigned to the case. This effort will continue.

By his attorney,

WILLIE J. DAVIS

BBO#: 116460

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Willi J. Dans

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CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of the within motion for leave to extend curfew was served upon the Government this 30th Day of June, 2004 by mailing a copy thereof and a fax to Assistant United States Attorney, Antoinette Leoney, United States Courthouse, One Courthouse Way, Boston, MA 02210; and to Pretrial Services by mailing a copy thereof and a fax to Thomas O'Brien at the same address.

Willie J. Davis